

Simpson Thacher & Bartlett LLP

425 LEXINGTON AVENUE
NEW YORK, NY 10017-3954

TELEPHONE: +1-212-455-2000
FACSIMILE: +1-212-455-2502

Direct Dial Number
+1-212-455-3070

E-mail Address
Brooke.Cucinella@stblaw.com

MEMO ENDORSED

BY ECF

September 10, 2020

The Honorable William H. Pauley III
United States District Judge
Southern District of New York
500 Pearl St.
New York, NY 10007

Re: *United States v. Daniels*, 19 Cr. 931-WHP-3 (S.D.N.Y.)

Dear Judge Pauley:

We represent Defendant Quinteria Daniels in the above-captioned case. We write to request that the Court schedule a change-of-plea hearing for Ms. Daniels. We have conferred with the Government on scheduling, and both parties are available on Wednesday, October 21, 2020 or Thursday, October 22, 2020. Additionally, Ms. Daniels can be available at the Court's convenience on any day thereafter.

Under the Coronavirus Aid, Relief, and Economic Security Act ("CARES Act") and Chief Judge McMahon's standing order, 20 Misc. 176, the Court may use video conferencing, or telephone conferencing if video is not reasonably available, to conduct a felony plea hearing with the consent of the defendant and upon a finding by the presiding judge that the proceeding cannot be further delayed without serious harm to the interests of justice. Ms. Daniels consents to a remote plea and indeed requests that her plea hearing take place by video conferencing, or telephone conferencing if video is not reasonably available, due to the ongoing risks associated with the COVID-19 pandemic. The Government does not oppose this request.

September 10, 2020

The Honorable William H. Pauley III

In accordance with the request by counsel for co-defendants Kamel Osborne and Lywan Reed (Dkt. No. 47), which Your Honor granted on September 10, 2020 (Dkt. No. 48), we request that any pre-trial deadlines previously imposed by the Court that fall before the change-of-plea hearings be adjourned until two weeks after the change-of-plea hearings scheduled for all defendants.

Thank you for your consideration.

Respectfully submitted,

/s/ Brooke Cucinella
Brooke Cucinella

cc: Counsel of record (by ECF)

Application granted. Change of plea conference scheduled for October 21, 2020 at 2:30 p.m. and will take place via Skype. The pretrial deadlines are adjourned as requested.

SO ORDERED:


WILLIAM H. PAULEY III
U.S.D.J.

September 14, 2020